

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#: 2/10/22  
DATE FILED: 2/10/22

LAW OFFICES OF  
JEFFREY LICHTMAN  
11 EAST 44<sup>TH</sup> STREET  
SUITE 501  
NEW YORK, NEW YORK 10017

[www.jeffreylichtman.com](http://www.jeffreylichtman.com)

JEFFREY LICHTMAN  
JEFFREY EINHORN  
JASON GOLDMAN

PH: (212) 581-1001  
FX: (212) 581-4999

February 2, 2022

**BY ECF**

Hon. Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Oberholzer, et al., 21 CR 475 (ALC)**

Dear Judge Carter:

I am writing on behalf of defendant Barend Oberholzer to respectfully request a modification of the defendant's conditions of release which would permit him to travel to Las Vegas from February 11 through 13, 2022 so that his daughter may participate in a gymnastics competition taking place at the Bally's Hotel and Casino. Both the government, by AUSA Jilan Kamal, and Pretrial Services, by PTSO Dominique Jackson, take no position on the defendant's application. If approved, Mr. Oberholzer would provide Pretrial Services with a detailed itinerary of his trip.

By way of background, on March 2, 2021, Judge Lehrburger released Mr. Oberholzer on a \$500K personal recognizance bond secured by two financially responsible persons, with conditions including, *inter alia*, that the defendant's travel be limited to the Southern and Eastern Districts of New York, and the Central and Southern Districts of California. Since that date, the defendant has remained compliant with his conditions of release.

JEFFREY LICHTMAN

Hon. Andrew L. Carter, Jr.  
United States District Judge  
February 2, 2022  
Page 2

Thank you for the Court's consideration on this application; I remain available for a teleconference should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

cc: Jilan Kamal Esq.  
Assistant United States Attorney (by ECF)

Dominique Jackson  
Pretrial Services (by email)

So Ordered:



2/10/22

Hon. Andrew L. Carter, Jr.